



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich  
Governor

September 16, 1999

Mr. Johnny Reising  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

**RE: Comments - PSP for AIP II Sector 3 Utility Trenches**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's September 13, 1999 submittal, "Project Specific Plan for Area I, Phase II Sector 3 Utility Trenches". Attached are Ohio EPA's comments on the document.

If you have any questions, please contact Donna Bohannon, Michelle Waller or me at (937) 285-6466.

Sincerely,

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
Terry Hagen, FDF  
Ruth Vandergrift, ODH  
Mark Shupe, HSI GeoTrans  
Francie Hodge, Tetra Tech EM Inc.  
Manager, TPSS/DERR,CO

**PSP for the Certification of A1P11 Utility Trenches Comments**

1. Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 2.2,      Pg. #: 2      Line #: 25-26      Code: E  
 Original Comment #:  
 Comment: This sentence appears to be incorrect. Line 25 is referencing this PSP.  
 Should it be referring to the CDL that accompanies this PSP? Please clarify.
  
2. Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 2.2      Pg. #: 2      Line #: 31-32      Code: C  
 Original Comment #:  
 Comment: The sampling plan presented here does not follow the plan as agreed  
 upon in Section 4 of the A1P11 Supplemental Characterization Package. Instead of  
 the certification sample being taken from a stockpile, FDF is to 'sample the last  
 bucket removed from the trench bottom for FRLs'. Please correct.
  
3. Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 2.4      Pg. #: 4      Line #: 10-12      Code: C  
 Original Comment #:  
 Comment: If above FRL contamination is found in the soils and they are removed,  
 then the area should be rescanned to ensure that all above FRL soils have been  
 removed.
  
4. Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 2.5      Pg. #: 4      Line #: 15-20      Code: C  
 Original Comment #:  
 Comment: In past PSP submittals, the sampling method or methods are spelled  
 out. However, this PSP states that other methods will be used "at the discretion of  
 the Sampling Field Manager". Please be specific.  
  
 This section also states that cores are being used to collect the soil samples.  
 Please clarify.
  
5. Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 2.5      Pg. #: 4      Line #: 18-19      Code: E  
 Original Comment #:  
 Comment: See comment # 2.
  
6. Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 2.5      Pg. #: 4      Line #: 24      Code: E  
 Original Comment #:  
 Comment: This sentence was left unfinished. Please correct.

PSP for A1PII Sector 3

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7. Commenting Organization: OEPA

Commentor: OFFO

Section #: Table 2-3

Pg. #: 5

Line #:

Code: C

Original Comment #:

Comment: Please include in Table 2-3 whether the on or off-site lab will be used for analyzing the samples, and the sample volume requirements.

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